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December 20, 2019

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz, Case No. 19-cv-3377-LAP***
Motion for Leave To File an Amended Complaint

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre regarding the motion for leave to file an amended complaint that accompanies this letter. This Court's Individual Practices require parties to seek leave of the Court before filing a motion for leave to amend pleadings. It is our understanding that the Stipulation and Order dated November 26, 2019, Doc. No. 95, provides that leave.

If that understanding is mistaken, we respectfully submit this letter pursuant to Individual Practices Rule 2, requesting the Court's leave to file the motion that accompanies this letter and/or to file the proposed amended complaint that accompanies the motion. The Court and the parties had an opportunity to discuss Plaintiff's motion and Defendant's objections thereto at the status conference on December 2, 2019. After that conference, counsel for the parties met and conferred, and Defendant maintained his opposition to the motion.

As set forth in the memorandum of law that accompanies the motion, Plaintiff's proposed amendment is proper. Federal Rule of Civil Procedure 15(a)(2) requires that leave to amend pleadings shall be freely given, and Plaintiffs' proposed amendment is not unduly delayed, does not prejudice Defendant, and is not futile.

Respectfully,

/s/ Charles J. Cooper
Charles J. Cooper

cc: Counsel of Record